

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : CHAPTER 13

John Juliano
Dana Juliano

DEBTOR : BKY. NO. 14-17132MDC

John Juliano
Dana Juliano

v. : ADV. NO. 14-00418MDC
WELLS FARGO BANK, NA, d/b/a
Wells Fargo Servicing Center :

MOTION FOR A DEFAULT JUDGMENT

1. Debtor commenced the adversary action by complaint on September 19, 2014. **Exhibit "A"**.
2. The complaint and summons were served on September 22, 2014. **Exhibit "B"**.
3. No answer was filed by October 22, 2014.
4. The complaint contains facts which support a finding that the second mortgage to defendant Wells Fargo is wholly unsecured.

WHEREFORE, Debtor prays that this Honorable Court find the mortgage debt to be wholly unsecured.

Respectfully submitted,

Date: October 23, 2014

____s/_____
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